

**IN THE NORTHERN DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BOARD OF TRUSTEES OF THE	)	
NORTHERN ILLINOIS BENEFIT FUND,	)	
BOARD OF TRUSTEES OF THE	)	
NORTHERN ILLINOIS PENSION FUND,	)	
BOARD OF TRUSTEES OF THE	)	
NORTHERN ILLINOIS EDUCATION	)	
FUND, BOARD OF TRUSTEES OF	)	No. 13 CV 370
THE NORTHERN ILLINOIS	)	
RETIREMENT FUND,	)	Judge Castillo
	)	
Plaintiffs,	)	Magistrate Judge Martin
	)	
v.	)	
	)	
ALEXANDER GAMMIE ASSOCIATES	)	
PLUMBING & HEATING COMPANY,	)	
an Illinois corporation,	)	
	)	
Defendants.	)	

**MOTION FOR JUDGMENT**

NOW COME the Plaintiffs, BOARD OF TRUSTEES OF THE NORTHERN ILLINOIS BENEFIT FUND, et al., by their attorneys, DONALD D. SCHWARTZ, ANDREW S. PIGOTT, and ARNOLD & KADJAN, and, in their Motion for Judgment, state as follows:

1. Plaintiffs filed their Complaint on January 17, 2013 seeking a fringe benefit contributions audit of Defendant.
2. On January 22, 2013, this Court administratively dismissed the Complaint, instructing Plaintiffs to yet serve the Complaint on Defendant, and, further, commanding Defendant to submit to audit.
3. Plaintiffs served Defendant with the Complaint on January 23, 2013.

4. Defendant submitted to an audit for the period August 1, 2012 through March 31, 2103.

5. According to the declaration of Douglas Maranda (Ex. A), Plaintiffs' auditor, Defendant is in arrears to Plaintiffs and owes:

- a. \$72.31 in Union dues;
- b. \$411.06 in Pension Fund contributions;
- c. \$144.50 in Retirement Fund contributions;
- d. \$331.50 in Health & Welfare Fund contributions;
- e. \$58.41 in Education Fund contributions;
- f. \$12.58 in Industry Fund contributions;
- g. \$3.40 in International Training Fund contributions;
- h. \$103.35 in liquidated damages based on these unpaid amounts;
- i. \$1,157.41 in liquidated damages for late-paid reports for November and December 2012, plus January, February and April 2013; and
- j. \$564.86 in audit costs.

6. According to the declaration of Andrew S. Pigott (Ex. B), thus far, Plaintiffs have incurred \$2,787.50 in attorney's fees and costs in this matter.

WHEREFORE, Plaintiffs ask this Court to enter the Order attached to this Motion as Exhibit C.

Respectfully submitted,  
**BOARD OF TRUSTEES OF THE NORTHERN  
ILLINOIS BENEFIT FUND, et al.**

BY: s/Andrew S. Pigott  
One of Plaintiffs' Attorneys

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